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To Ward Burns, Shelly Rios/ARTD/R7/USEPA/US@EPA
cc
bcc
Subject NDEQ PEMS Rulemaking

Ward, Shelly:

I took a quick glance at the "Concise Explanatory Statement for Changes" to NDEQ's proposed PEMS rule and don't have any major comments. I recall taking a hard look at the draft rule and talking with Todd Ellis about a number of outstanding issues they had with the Pavilion proposal. It appears that Nebraska has tightened up the rule of changes based on those discussions. On balance, I think it is worthwhile to proceed with the rulemaking, even though EPA has yet to propose the PS-16 performance specification for PEMS, on the theory that the rule at least standardizes NDEQ's evaluation process.

If you have any questions, please let me know.

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